

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA, *ex rel.*  
DILBAGH SINGH, M.D.,  
PAUL KIRSCH, M.D.,  
V. RAO NADELLA, M.D., and  
MARTIN JACOBS, M.D.,**

## Relators,

**V.**

**Civil Action No. 04-186E**

**BRADFORD REGIONAL  
MEDICAL CENTER,  
V & S MEDICAL ASSOCIATES, LLC,  
PETER VACCARO, M.D.,  
KAMRAN SALEH, M.D.,  
and DOES I through XX,**

**Defendants.**

**UNOPPOSED MOTION FOR PROTECTIVE ORDER  
GOVERNING CONFIDENTIALITY OF DOCUMENTS TO BE  
PRODUCED AND INFORMATION OBTAINED IN DISCOVERY**

Bradford Regional Medical Center (hereinafter referred to as "BRMC"), by and through its undersigned attorney, move this Court to enter the attached Protective Order governing the confidentiality of documents to be produced and information obtained in discovery. BRMC represents to the Court that counsel for the Relators and other Defendants have consented to entering the attached Order.

Respectfully submitted this 22nd day of February 2007.

/s/ Daniel M. Mulholland III

Daniel M. Mulholland III

HORTY, SPRINGER & MATTERN, P.C.

4614 Fifth Avenue

Pittsburgh, PA 15213

Phone: 412-687-7677

Fax: 412-687-7692

E-Mail: [dmulholland@hortyspringer.com](mailto:dmulholland@hortyspringer.com)

Attorney for Defendant